

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE: Raymond James Smollin	:	CHAPTER 13
	:	
Debtors.	:	5:20-bk-01750-MJC
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Lakeview Loan Servicing, LLC	:	
	:	
Movant,	:	
	:	
v.	:	11 U.S.C. §362
	:	
Raymond James Smollin	:	
	:	
Respondents	:	

ANSWER TO MOVANT’S MOTION FOR RELIEF

AND NOW, comes the Debtors, Richard and Mary Eller, by and through their Attorney,
Patrick J. Best, of ARM Lawyers, who hereby answers as follows:

1. Admitted.
2. Admitted that stay relief is requested but denied that it should be granted.
3. Admitted.
4. Denied. Movant has adequate protection.
5. Denied. Strict proof is demanded at trial.
6. Denied. Non-payment alone does not create a lack of adequate protection where there is sufficient equity in a property.
7. Denied. Movant is adequately protected and the property is necessary to an effective reorganization.
8. Admitted insofar as this is Movant’s request, but denied that it should be granted.
9. Denied Rule 4001(a)(3) factors are not implicated.
10. Admitted insofar as this is Movant’s request, but denied that it should be granted.

WHEREFORE, Debtors respectfully request that this Honorable Court deny Movant's Motion for Relief.

Date: August 5, 2022

/s/ Patrick J. Best
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